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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY [initials] DEPUTY

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff,	Magistrate No. 08MJ8512
v.	COMPLAINT FOR VIOLATION OF:
Adrian TEJADA-Garduza (1)	Title 18 U.S.C. § 3144
Jose CHICAS-Martinez (2)	F.R.Crim.P. [Material Witness]
Milton MONROY-Perez (3)	**RELATED TO 08MJ8498, 08MJ8499 and 08CR1696-H**
Gerardo AVILA-Tobanche (4)	
Francis TINOCO-Velasquez (5)	
Ruben VALADEZ-Arrendondo (6)	
Eusebio MARTINEZ-Perez (7)	
Melkin LINCONA-Ovando (8)	
Miguel NAJERA-Lopez (9)	
Brenda GARCIA-Ontiveros (10)	
Material Witnesses.	

The undersigned complainant being duly sworn states:

That on or about June 4, 2008, within the Southern District of California, material witnesses, Adrian TEJADA-Garduza, Jose CHICAS-Martinez, Milton MONROY-Perez, Gerardo AVILA-Tobanche, Francis

TINOCO-Velasquez, Ruben VALADEZ-Arrendondo, Eusebio MARTINEZ-Perez, Melkin LINCONA-Ovando, Miguel NAJERA-Lopez, Brenda GARCIA-Ontiveros are witnesses in support of complaints filed against CARLOS RAMOS-GALDAMEZ and JOUANNI FRANCISCO PEREZ-TINOCO, in violation of Title 42, U.S.C. § 408(a)(7)(B), False Representation of a Social Security Number. It is impracticable to secure the presence of the above-referenced material witnesses by subpoena. The affiant further alleges that the above-referenced material witnesses are citizens and natives of Mexico and Honduras with no legal right to remain in the United States, and have no apparent means of support or family ties. Therefore, the above-referenced material witnesses are material witnesses under Title 18, United States Code, Section 3144.

This complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Diana Lacuesta

DIANA LACUESTA
Special Agent
U. S. Immigration & Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 6TH DAY OF JUNE, 2008.

PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

UNITED STATES OF AMERICA

v.

Adrian TEJADA-Garduza (1)

Jose CHICAS-Martinez (2)

Milton MONROY-Perez (3)

Gerardo AVILA-Tobanche (4)

Francis TINOCO-Velasquez (5)

Ruben VALADEZ-Arrendondo (6)

Eusebio MARTINEZ-Perez (7)

Melkin LINCONA-Ovando (8)

Miguel NAJERA-Lopez (9)

Brenda GARCIA-Ontiveros (10)

STATEMENT OF FACTS

On June 4, 2008, at approximately 1220 hours, U.S. Immigration & Customs Enforcement Special Agents executed an arrest warrant on JOUANNI FRANCISCO PEREZ-TINOCO at a location near the Intersection of Forrester and Keystone Roads in Imperial County. During the execution of the warrant agents encountered eighteen (18) illegal aliens leaving the location. All eighteen (18) illegal aliens were arrested and transported to the U. S. Border Patrol Station in Imperial, California.

On June 4, 2008, at approximately 1815 hours, U.S. Immigration & Customs Enforcement Special Agents executed an arrest warrant on CARLOS RAMOS-GALDAMEZ at a separate location in northern Imperial County. During the execution of the warrant, agents encountered thirteen (13) illegal aliens leaving the location. All thirteen

(13) illegal aliens were arrested and transported to the U. S. Border Patrol Station in Imperial, California.

JOUANNI FRANCISCO PEREZ-TINOCO and CARLOS RAMOS-GALDAMEZ are both former or current supervisors/foremen employed by Boss 4 Packing.

Material Witnesses Francis David TINOCO-Velasquez and Melkin LICONA-Obando stated they are citizens of Honduras. Material Witnesses Gerardo AVILA-Tobanche, Ruben VALADEZ-Arredondo, Jose CHICAS-Martinez, Miguel NAJERA-LOPEZ, Milton MONROY-Perez, Adrian TEJADA-Garduza, Eusebio MARTINEZ-Perez, and Brenda GARCIA-Ontiveros stated they are citizens of Mexico. All the material witnesses stated they have no legal immigration documents to enter, remain, or work in the United States legally.

Material Witnesses Francis David TINOCO-Velasquez, AVILA, CHICAS, NAJERA, MONROY, TEJADA, MARTINEZ, and GARCIA stated they are current or former employees of Boss 4 Packing and were issued paychecks bearing fraudulent social security numbers and/or names by employees of Boss 4.

Material Witness TINOCO-Velasquez stated he is a former employee of Boss 4 Packing. TINOCO-Velasquez explained that he was issued paychecks bearing fraudulent names and social security numbers. The checks were issued by his former supervisor/foreman Carlos RAMOS or JOUANNI FRANCISCO PEREZ-TINOCO, AKA: "Chapo". Currently, TINOCO-Velasquez is employed by Collazo Packing and is supervised by PEREZ-TINOCO.

Material Witness AVILA stated he was formerly employed by Boss 4 Packing. Currently he is employed by "Collazo Packing". AVILA is issued paychecks containing fraudulent information from his foreman PEREZ-TINOCO.

Material Witness VALADEZ stated he is formerly employed by Boss 4 and currently employed by "Collazo Packing". VALADEZ is supervised by PEREZ-TINOCO. VALADEZ stated he was issued pay checks with fraudulent names and social security numbers by PEREZ-TINOCO while employed by Boss 4 Packing.

Material Witness CHICAS stated he is supervised by RAMOS. CHICAS informed RAMOS of his illegal immigration status. CHICAS stated he has received paychecks which bear fraudulent names and social security numbers from Boss 4 Packing.

Material Witness NAJERA stated has been supervised by both PEREZ-TINOCO and RAMOS. Employees of Boss 4 Packing provided him with a fraudulent social security number.

Material Witness MONROY stated he was provided a fraudulent social security number by an employee of Boss 4 Packing. MONROY has been supervised by both PEREZ-TINOCO and RAMOS. MONROY has received paychecks with different fraudulent names and social security numbers.

Material Witness TEJADA stated Boss 4 Packing provided him with a fraudulent name and social security number. TEJADA has been supervised by both RAMOS and PEREZ-TINOCO.

Material Witness MARTINEZ stated he informed his supervisors that he was an illegal alien. MARTINEZ was provided with a fraudulent name and social security number by an employee of Boss 4 Packing.

Material Witness GARCIA stated she is employed by Boss 4 Packing. GARCIA was provided with a fraudulent name and social security on her paychecks.